

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION**

Kalishwar Das,)	Civil Action No. 0:19-1290-JMC-PJG
)	
Plaintiff,)	
)	
vs.)	
)	
Pushpa Inc., Rajesh Hassani, United States)	<u>DEFENDANT PUSHPA DISCOUNT</u>
Department of Labor, Wage and Hour)	<u>STORE, INC.'S ANSWERS TO</u>
Division,)	<u>LOCAL CIVIL RULE 26.01 (D.S.C.)</u>
)	<u>INTERROGATORIES</u>
Defendants.)	
)	

Defendant Pushpa Discount Store, Inc. (“Defendant Pushpa”), improperly identified as Pushpa Inc., by and through its undersigned counsel, responds to Local Civil Rule 26.01 (D.S.C.) Interrogatories as follows:

LOCAL CIVIL RULE 26.01 (D.S.C.) INTERROGATORIES

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: Defendant Pushpa is not aware of any person or legal entity who may have a subrogation interest in Plaintiff’s claims. However, Defendant Pushpa reserves its right to amend this response if it later discovers the existence of such an interest.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff has requested a jury trial. Defendant Pushpa does not oppose Plaintiff’s request for a trial by jury if the causes of action have not already been dismissed pursuant to any motion by Defendant Pushpa and are otherwise appropriate to be tried by a jury.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Defendant Pushpa is not a publicly-owned company. Defendant Pushpa is not a parent of any publicly-owned company. Defendant Pushpa does not own 10% or more of the outstanding shares in any publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: This action was properly removed to the division encompassing the state court where the action was originally filed.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Defendant Pushpa is not aware of any other action filed in this District related to this matter.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Defendant Pushpa Discount Store, Inc. is improperly identified as Pushpa Inc. Counsel for Defendant Pushpa will accept service of an amended summons and complaint reflecting the correct identification.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER: At this time, Defendant Pushpa does not contend that another person or legal entity is liable. Defendant Pushpa, however, expressly reserves the right to later identify a person or legal entity who may be liable to either Plaintiff or Defendant Pushpa upon discovery of such person or other legal entity.

(Signature Page Follows)

Respectfully submitted,

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Columbia, South Carolina
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